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Federal Defenders OF NEW YORK, INC.

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November 24, 2021

By ECF

Honorable Andrew L. Carter United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED

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12/1/2021 DATE FILED:

Re: **United States v. Kellivan Blount** 21 Cr. 531 (ALC)

Dear Judge Carter,

I write to respectfully request that the Court adjourn the motions schedule and the next status conference in this case for an additional 30 days. If this request is granted, we ask that defense motions be due December 22, the government's response be due January 17; and any defense reply be due February 4. We ask that the next conference be scheduled for a date after February 4.

The parties are still continuing to discuss a possible disposition of this matter, which would negate the need for further litigation. We expect this requested adjournment will allow us to complete those discussions.

The Government, by Assistant United States Attorney Alexie Rothman, consents to this application.

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the newly-selected date. Thank you for your consideration.

Respectfully submitted,

/s/

Sylvie Levine Counsel for Mr. Blount The application is **GRANTED**. The 1/19/22 status conference is adjourned without a date. The parties shall file a joint status report on 2/8/22. Time excluded from 1/19/22 to 2/8/22 in the interest of justice. So Ordered.

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